

**From:** [Schindler, Jason](#)  
**To:** [Ferreira, Steve](#); [Nancy Hamill](#)  
**Cc:** [Ferreira, Gina](#); [Mark D. Fisher \(mfisher@elminc.com\)](#); [Ansari, Ramin](#); [Venkat Puranapanda \(Venkat.puranapanda@chubb.com\)](#); [Devorak, Coleen](#); [Peachey, Bryan](#); [Sontag, John](#); [Kirby, Lisa](#); [Ostapczuk, Eric](#)  
**Subject:** RE: Hatco pond sampling plan  
**Date:** Wednesday, April 08, 2020 11:40:28 AM  
**Attachments:** [Figure 1 - SEL Pond Sample Locations.pdf](#)

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Hi Steve and Nancy,

We have added responses to your remaining comments below. We have scheduled the Phase 1 sampling for Thursday, April 16. The samples will be analyzed using a standard laboratory turnaround time. Please let me know if you have further comments or if you need additional time to complete your review before we implement the Phase 1 sampling program.

Thanks,

Jason

Jason Schindler

Principal Project Manager

Weston Solutions, Inc.

205 Campus Drive

Edison, NJ 08837

Tel: 732-417-5804

Cell: 732-740-5529

Fax: 732-417-5801

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**From:** Ferreira, Steve [<mailto:Ferreira.Steve@epa.gov>]

**Sent:** Wednesday, April 1, 2020 6:28 AM

**To:** Schindler, Jason <[Jason.Schindler@WestonSolutions.com](mailto:Jason.Schindler@WestonSolutions.com)>

**Cc:** Ferreira, Gina <[Ferreira.Gina@epa.gov](mailto:Ferreira.Gina@epa.gov)>

**Subject:** RE: Hatco pond sampling plan

**\*\* External Email \*\***

Hi Jason:

Below please find a consolidated EPA/NJDEP letter concerning the response to EPA & NJDEP's previous comments. Any questions, please let me know,

Steve

**Weston Response to USEPA General Comment 1.** The original fill material used to reconstruct the wetland area was certified clean fill material (topsoil), not sediment placed in accordance with applicable NJDEP regulation and guidance (e.g., NJDEP Fill Material Guidance for SRP Sites), as well as in accordance with the NJDEP-approved wetland disruption permit for this area. The certified clean fill material utilized in this area was compared to site-specific remediation standards including, as applicable, NJDEP Soil Remediation Standards and Default Impact to Groundwater Soil Screening Levels. Additionally, the method detection limits for the conventional analytical methods used to document the clean fill are higher than the ecological screening criteria (ESC). Therefore, the original data cannot be compared to the ESC. Because the intent of the first phase of the proposed plan is to evaluate whether the clean fill previously placed in this area has been adversely affected, Weston intends to use the same analytical methods, as applicable, and compare the results to the same criteria as the original clean fill data. If the analytical results indicate that the clean fill has been affected by the recent release, then further sampling will be recommended as warranted to address all applicable receptors. The surface water sample

results will be compared with applicable Surface Water Quality Standards (NJAC 7:9B) for FW2.

**March 2020 USEPA RTC** – *The pond bottom media is considered sediment at this point. NJDEP’s definition of sediment states that “... all unconsolidated material below a water body” is considered sediment for remedial investigations and actions. Please provide the ESC values referenced in this response in the report tables for comparison of collected soil, surface water, and sediment samples. Weston can proceed with comparing the clean fill to the same criteria as previously used (NJDEP SRS and DIGWSSL) but should also compare the soil, surface water, and sediment samples to appropriate ESC values for the protection of wildlife as well.*

**Weston Response to March 2020 USEPA RTC.**

Weston agrees that if evidence of contamination is detected then the remediation efforts will include comparison to all applicable criteria including ESCs. The Phase 1 sampling is intended to assess whether evidence of impact is present and will involve sample testing using the same analytical methodologies as the original clean fill samples (i.e., SW-846 methods). Weston will also compare the results to the ESCs with the understanding that the quantitation limits will not necessarily meet the ESCs for analytes with very low values. If evidence of impact is identified based on the Phase 1 sample data, then the need for further analysis using methods that can achieve lower quantitation limits will be determined in consultation with USEPA and NJDEP. Weston will screen the results against the Fresh Water ESCs for Surface Water (FW2), Freshwater ESCs for sediment, and ESC/EcoSSLs for soil published by NJDEP and dated March 10, 2009. We will use the NJDEP summary table dated March 10, 2009.

**Weston Response to USEPA General Comment 2.** The attached drawing shows the location of the AOCs. This has been added to the plan as figure 2. *The response is acknowledged and accepted by USEPA.*

**Weston Response to USEPA General Comment 3.** Figure 1 has been updated to show the limits of clean fill. The pathway from the recent release was clearly visible at the time of the release and mapped on the drawing. As noted during the site visit on February 18, 2020, this pathway remains visible today. *The response is acknowledged and accepted by USEPA.*

**Weston Response to USEPA General Comment 4.** Weston has added samples to Phase 1 in the FSP. This includes the pond bottom samples and surface water samples biased to the locations noted in NJDEP’s comment 2 below. The additional Phase 1 samples consist of a surface water sample at the northern section of the pond and four additional solid from accessible pond bottom material below the water line near the four pond bottom locations already proposed above the water line. The need for additional sampling, if any, will be based on the results of the initial sampling and collected during Phase 2.

**March 2020 USEPA RTC** – *USEPA and NJDEP recommended that additional sediment (pond bottom) and surface water samples be added in the northern portion of the Southeast Leg Wetland Pond; it does not seem like this was done. USEPA recommends either adding two additional co-located sediment and surface water samples in the northern interior portion of the pond (~ parallel to SEL-PA-SB04 and SEL-PA-SB27) or moving samples SEL-PA-Bottom 02 and SEL-PA-Bottom 04 to the northern interior of the pond; these should be co-located sediment and surface water samples.*

**Weston Response to March 2020 USEPA RTC.**

Weston’s previous response included the addition of four pond bottom samples with co-located surface water samples. We intended this to be responsive to the original comment. Weston will relocate samples SEL-PA-Bottom 02 and SEL-PA-Bottom 04 to the northern interior of the pond, at the locations suggested above. The revised sample location map is attached.

**Weston Response to USEPA Specific Comment 1.** The contaminated soil consists of soil

containing less than 500 mg/kg PCBs that was excavated and consolidated beneath the engineered cap as part of the Southeast Leg remediation project in accordance with the approved work plan. The concern regarding this investigation deals with (1) any impacts from the release from the facility standpipe in this area and (2) any impacts from the erosion of the cap installed on top of the contaminated soil previously consolidated in this area as part of the EPA/NJDEP-approved remedial actions for this area of the Site. The soil is not discolored and does not have a sheen. *The response is acknowledged and accepted by USEPA.*

**Weston Response to NJDEP Comment 1.** The SEL Wetland Pond area is a man-made pond/wetlands that was re-constructed in accordance with a NJDEP-approved wetland disruption permit as part of the remedial actions for this area of the Site. The pond is approximately one third of an acre in size (see figure 2 for the location and size of the area). The water level in the pond is consistent with the water table in this area. No fish or other wildlife were stocked in the pond following construction. There is one outlet from the pond which consists of a concrete pipe that discharges to the wetland area associated with Channel A to the west.

All visible sheen was observed and removed during the initial response action. This sheen was removed using sorbent wipes and boom as noted in the summary report provided to USEPA on July 10, 2018. No sheen remains. The leak in the sewer that was the source of the release has been repaired. Figure 2 has been added to show the relative locations of the AOCs.

**March 2020 NJDEP RTC** – *The response is acceptable. Please note that, notwithstanding the pond was not stocked with fish or wildlife, natural replenishment is expected.*

**Weston Response to March 2020 USEPA RTC.**

Weston has observed natural replenishment of wildlife in the pond area, since it was originally constructed.

**Weston Response to NJDEP Comment 2.**

The source of the release was identified as the joint between an underground sewer pipe and riser pipe. The sampling program focusses along the observed pathway and edge of water where the evidence of release was observed. These are the areas of clean fill that are most likely to have been impacted. A heavy sheen was observed floating on the water in the pond at these locations and have been identified as the most likely areas for contamination to have occurred (i.e., sampling is biased to suspected worst-case locations). However, in response to this comment, we have added four pond bottom samples, to be collected below the water line, near each of the planned soil sample locations. We have also added a surface water sample from the northern portion of the pond. Both the northern pond bottom and northern surface water sample locations are biased to the area of the release pathway influent at the northern portion of the pond. If one or more of the pond bottom samples collected during Phase 1 indicates the presence of contamination, then the Phase 2 sampling will be modified to include additional pond bottom samples. The subsequent sampling will depend on both the Phase 1 and Phase 2 data and will include a minimum of two sample depths. Phase 1 and Phase 2 sample locations will be collected at the 0 to 0.5-foot interval only. TOC analysis has been added for the soil and pond bottom samples. The initial surface water samples will be analyzed for total metals. If results indicate the need for further evaluation, then dissolved metals will be added for subsequent sample analysis during Phase 2 or Phase 3.

**March 2020 NJDEP RTC** - *The "Pond Bottom" (sediment) sample locations proposed in the revised March 2020 FSP are not adequate for Phase I sampling. NJDEP concurs with "USEPA RTC, General Comment 4" that a minimum of three (3) three sediment and co-located surface water samples should be collected in the northern/influent portion of the pond.*

**Weston Response to March 2020 NJDEP RTC:**

Please see response to USEPA's General Comment 4 above.

**Weston Response to NJDEP Comment 3.**

Weston's intent is to initially compare the data with sample results for the clean fill used to reconstruct the area. If the results are consistent with the clean fill results, indicating no impacts, then no further action will be recommended. If evidence of impacts is identified, then Weston will evaluate and restore the wetlands in accordance with applicable guidance.

**March 2020 NJDEP RTC** - NJDEP does not agree with the approached proposed for data evaluation. The certified clean fill material used to restore the wetlands (or any ecological exposure areas) should have met NJDEP's ecological screening criteria (ESC). NJDEP concurs with "USEPA RTC, General Comment 1." In addition to comparing new data with previous "clean fill" data, NJDEP SRS and DIGWSSL, new "pond bottom" sediment data must be compared with sediment ESC. (As an example of concern, Residential SRS for copper is approximately 100X the sediment ESC). Laboratory analytical method detection limits must meet the ESC. Weston should plan to consult with NJDEP and USEPA on the Phase 1 results

**Weston Response to March 2020 NJDEP RTC**

The clean fill used to construction the pond met the requirements of NJDEP guidance. The clean fill was not contaminated or suspected to contain contaminants at concentrations above ecological screening criteria when it was placed. However, as you noted, certain of the detection limits used in conventional SW-846 sample analyses are greater than some of the ESCs, which does not allow for a direct comparison to some of the ESCs. Weston intends to apply the same analytical methods to obtain data that are comparable to the original data. If evidence of contamination is detected then the remediation data will be compared to all applicable criteria including ESCs. Weston will consult with NJDEP and USEPA on the Phase 1 results before proceeding with additional sampling.

**Weston Response to NJDEP Comment 4.**

The LSRP has been added to the contact list. *The response is acceptable.*

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**From:** Schindler, Jason <[Jason.Schindler@WestonSolutions.com](mailto:Jason.Schindler@WestonSolutions.com)>

**Sent:** Friday, March 13, 2020 1:12 PM

**To:** Nancy Hamill <[Nancy.Hamill@dep.nj.gov](mailto:Nancy.Hamill@dep.nj.gov)>

**Cc:** Ferreira, Steve <[Ferreira.Steve@epa.gov](mailto:Ferreira.Steve@epa.gov)>; Mark D. Fisher (<[mfisher@elminc.com](mailto:mfisher@elminc.com)>  
<[mfisher@elminc.com](mailto:mfisher@elminc.com)>

**Subject:** FW: Hatco pond sampling plan

Hi Nancy,

I inadvertently left you off of the distribution list for the response message below. Feel free to contact Mark or myself with any questions.

Thanks,

Jason

Jason Schindler

Principal Project Manager

Weston Solutions, Inc.

205 Campus Drive

Edison, NJ 08837

Tel: 732-417-5804

Cell: 732-740-5529

Fax: 732-417-5801

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**From:** Schindler, Jason

**Sent:** Friday, March 13, 2020 12:47 PM

**To:** Ferreira, Steve <[Ferreira.Steve@epa.gov](mailto:Ferreira.Steve@epa.gov)>

**Cc:** Mark D. Fisher ([mfisher@elminc.com](mailto:mfisher@elminc.com)) <[mfisher@elminc.com](mailto:mfisher@elminc.com)>; Ansari, Ramin <[Ramin.Ansari@lanxess.com](mailto:Ramin.Ansari@lanxess.com)>; Venkat Puranapanda ([Venkat.puranapanda@chubb.com](mailto:Venkat.puranapanda@chubb.com)) <[Venkat.puranapanda@chubb.com](mailto:Venkat.puranapanda@chubb.com)>; Devorak, Coleen ([Coleen.Devorak@WestonSolutions.com](mailto:Coleen.Devorak@WestonSolutions.com)) <[Coleen.Devorak@WestonSolutions.com](mailto:Coleen.Devorak@WestonSolutions.com)>; Peachey, Bryan <[Bryan.Peachey@WestonSolutions.com](mailto:Bryan.Peachey@WestonSolutions.com)>; Sontag, John <[John.Sontag@WestonSolutions.com](mailto:John.Sontag@WestonSolutions.com)>; Kirby, Lisa <[Lisa.Daniel@lanxess.com](mailto:Lisa.Daniel@lanxess.com)>; Ostapczuk, Eric <[Eric.Ostapczuk@tetrattech.com](mailto:Eric.Ostapczuk@tetrattech.com)>

**Subject:** RE: Hatco pond sampling plan

Hi Steve,

Following are our responses to USEPA and NJDEP comments on the draft field sampling plan. Agency comments are reproduced below with our direct responses. I have also attached a complete copy of the revised plan incorporating the changes described. Feel free to contact me if you have any questions or concerns.

Thanks,

Jason

Jason Schindler

Principal Project Manager

Weston Solutions, Inc.

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Edison, NJ 08837

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**USEPA General Comment 1.** Since the area of concern is a reconstructed wetland, the primary intent of the program should be to delineate the extent of soil, **sediment**, and surface water contamination. As a result of this, soil, sediment, and surface water sample results should be compared to ecological screening criteria to identify contaminants of concern not the human-health based criteria presented in Table 1.

**Response to USEPA General Comment 1.** The original fill material used to reconstruct the wetland area was certified clean fill material (topsoil), not sediment placed in accordance with applicable NJDEP regulation and guidance (e.g., NJDEP Fill Material Guidance for SRP Sites), as well as in accordance with the NJDEP-approved wetland disruption permit for this area. The certified clean fill material utilized in this area was compared to site-specific remediation standards including, as applicable, NJDEP Soil Remediation Standards and Default Impact to Groundwater Soil Screening Levels. Additionally, the method detection limits for the conventional analytical methods used to document the clean fill are higher than the ecological screening criteria (ESC). Therefore, the original data cannot be compared to the ESC. Because the intent of the first phase of the proposed plan is to evaluate whether the clean fill previously placed in this area has been adversely affected, Weston intends to use the same analytical methods, as applicable, and compare the results to the same criteria as the original clean fill data. If the analytical results indicate that the clean fill has been affected by the recent release, then further sampling will be recommended as warranted to address all applicable receptors. The surface water sample results will be compared with applicable Surface Water Quality Standards (NJAC 7:9B) for FW2.

**USEPA General Comment 2.** A figure needs to be included illustrating the relationship of this pond area to the other AOCs at the site and the site as a whole.

**Response to USEPA General Comment 2.** The attached drawing shows the location of the AOCs. This has been added to the plan as figure 2.

**USEPA General Comment 3.** Figure 1 needs to include additional information such as the

limits of clean fill around the pond and the area of reconstructed wetlands. Information needs to be added to the text indicating why the preferential pathway was chosen from the release source area to the open water in the pond. Is there a ditch or submerged area that would direct all water only through this path compared to entering the wetland in a radial direction from the release area?

**Response to USEPA General Comment 3.** Figure 1 has been updated to show the limits of clean fill. The pathway from the recent release was clearly visible at the time of the release and mapped on the drawing. As noted during the site visit on February 18, 2020, this pathway remains visible today.

**USEPA General Comment 4.** Additional samples need to be added to this plan including sediment samples throughout the pond and surface water samples toward the northern section of the pond. These samples can be proposed in a phased approach as well with an emphasis on the northern sections of the pond.

**Response to USEPA General Comment 4.** Weston has added samples to Phase 1 in the FSP. This includes the pond bottom samples and surface water samples biased to the locations noted in NJDEP's comment 2 below. The additional Phase 1 samples consist of a surface water sample at the northern section of the pond and four additional solid from accessible pond bottom material below the water line near the four pond bottom locations already proposed above the water line. The need for additional sampling, if any, will be based on the results of the initial sampling and collected during Phase 2.

**USEPA Specific Comment 1.** Page 1, 3<sup>rd</sup> paragraph, 2<sup>nd</sup> and 3<sup>rd</sup> sentences – These sentences mention “contaminated soil” but do not indicate how this designation was determined. Was the soil discolored, did it have a sheen, was sampling performed, etc? Please provide additional information indicating why the soil was considered contaminated.

**Response to USEPA Specific Comment 1.** The contaminated soil consists of soil containing less than 500 mg/kg PCBs that was excavated and consolidated beneath the engineered cap as part of the Southeast Leg remediation project in accordance with the approved work plan. The concern regarding this investigation deals with (1) any impacts from the release from the facility standpipe in this area and (2) any impacts from the erosion of the cap installed on top of the contaminated soil previously consolidated in this area as part of the EPA/NJDEP-approved remedial actions for this area of the Site. The soil is not discolored and does not have a sheen.

**NJDEP Comment 1.** (p. 1) 1. *Problem Definition* – Please provide a summary of the physical/habitat characteristics of the SEL Wetland Pond Area, such as size/areal extent, hydrogeology (pond bottom elevation range, water depth), fish/wildlife presence/use, etc. Is there an outlet from the pond? Please provide a figure showing its location relative to AOC 24 Woodbridge Pond and other labelled site AOCs above Riverside Dr. This section states that “heavy sheen” was recovered by Weston – does any sheen remain? Has the leak in the sewer been repaired/dischARGE stopped?

**Response to NJDEP Comment 1.** The SEL Wetland Pond area is a man-made pond/wetlands that was re-constructed in accordance with a NJDEP-approved wetland disruption permit as part of the remedial actions for this area of the Site. The pond is approximately one third of an acre in size (see figure 2 for the location and size of the area). The water level in the pond is consistent with the water table in this area. No fish or other wildlife were stocked in the pond following construction. There is one outlet from the pond which consists of a concrete pipe that discharges to the wetland area associated with Channel A to the west.

All visible sheen was observed and removed during the initial response action. This sheen was removed using sorbent wipes and boom as noted in the summary report provided to USEPA on July 10, 2018. No sheen remains. The leak in the sewer that was the source of the release has been repaired. Figure 2 has been added to show the relative locations of the AOCs.

**NJDEP Comment 2.** (p. 2) 3. *Sample Design, Rationale, Locations* – three (3) phases of sampling are proposed and limited to the stormwater sewer release pathway and perimeter wetland soils surrounding Southeast Leg (SEL) Wetland Pond at the approximate waterline. It is unclear how this approach will meet the objective to determine the “contaminants which have impacted the clean fill used to construct the SEL Wetland Pond in 2015.” In addition to proposed locations, Phase 1 sampling should include biased pond sediment and co-located surface water samples at the release pathway influent location (at north end of pond), covering an appropriate portion of the pond (e.g., the northern half). The design of subsequent sampling phases (e.g., gridding) should depend on Phase 1 data. In accordance with NJDEP’s *Ecological Evaluation Technical Guidance*, August 2018, a minimum of 2 sample depths at each soil/sediment location should be collected (0-0.5’ and at least one other subsurface interval). TOC analyses are recommended at each sediment location, and total and dissolved metals should be analyzed at each surface water location.

**Response to NJDEP Comment 2.**

The source of the release was identified as the joint between an underground sewer pipe and riser pipe. The sampling program focusses along the observed pathway and edge of water where the evidence of release was observed. These are the areas of clean fill that are most likely to have been impacted. A heavy sheen was observed floating on the water in the pond at these locations and have been identified as the most likely areas for contamination to have occurred (i.e., sampling is biased to suspected worst-case locations). However, in response to this comment, we have added four pond bottom samples, to be collected below the water line, near each of the planned soil sample locations. We have also added a surface water sample from the northern portion of the pond. Both the northern pond bottom and northern surface water sample locations are biased to the area of the release pathway influent at the northern portion of the pond. If one or more of the pond bottom samples collected during Phase 1 indicates the presence of contamination then the Phase 2 sampling will be modified to include additional pond bottom samples. The subsequent sampling will depend on both the Phase 1 and Phase 2 data and will include a minimum of two sample depths. Phase 1 and Phase 2 sample locations will be collected at the 0 to 0.5-foot interval only. TOC analysis has been added for the soil and pond bottom samples. The initial surface water samples will be analyzed for total metals. If results indicate the need for further evaluation then dissolved metals will be added for subsequent sample analysis during Phase 2 or Phase 3.

**NJDEP Comment 3.** (p.2) Sections 3.1 and 3.2 state that the NJDEP Residential and Non-Residential Direct Contact Soil Cleanup Criteria will be used for data comparison and contaminant delineation. As a reconstructed wetland and apparent open water area, the SEL Wetland Pond Area is an environmentally sensitive natural resource (ESNR) and comparison of data with ecological sediment/soil screening criteria is paramount. Please refer to <https://www.nj.gov/dep/srp/guidance/ecoscreening/>. Similar to the data evaluation approach used for Woodbridge Pond, the EPA-directed sediment delineation/remediation criteria for total PCBs of 1 mg/kg and for BEHP of 22 mg/kg (Washington State freshwater sediment standard) should be used for the SEL Wetland Pond sediments.

**Response to NJDEP Comment 3.**

Weston’s intent is to initially compare the data with sample results for the clean fill used to reconstruct the area. If the results are consistent with the clean fill results, indicating no impacts, then no further action will be recommended. If evidence of impacts is identified, then Weston will evaluate and restore the wetlands in accordance with applicable guidance.

**NJDEP Comment 4.** (p. 3) 4. *Key Project Personnel and Contact Information* – Please add the LSRP of record to this list.

**Response to NJDEP Comment 4.**

The LSRP has been added to the contact list.

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**From:** Ferreira, Steve [<mailto:Ferreira.Steve@epa.gov>]  
**Sent:** Tuesday, February 11, 2020 6:24 AM  
**To:** Schindler, Jason <[Jason.Schindler@WestonSolutions.com](mailto:Jason.Schindler@WestonSolutions.com)>  
**Subject:** RE: Hatco pond sampling plan  
**\*\* External Email \*\***

Hi Jason:

Here are our comments. Please note that our risk assessor coordinated with the NJDEP's eco risk assessor on this project, and additional comments from NJDEP have been included.  
Any questions, please let me know.

Steve

### **General Comments**

Since the area of concern is a reconstructed wetland, the primary intent of the program should be to delineate the extent of soil, **sediment**, and surface water contamination. As a result of this, soil, sediment, and surface water sample results should be compared to ecological screening criteria to identify contaminants of concern not the human-health based criteria presented in Table 1.

A figure needs to be included illustrating the relationship of this pond area to the other AOCs at the site and the site as a whole.

Figure 1 needs to include additional information such as the limits of clean fill around the pond and the area of reconstructed wetlands. Information needs to be added to the text indicating why the preferential pathway was chosen from the release source area to the open water in the pond. Is there a ditch or submerged area that would direct all water only through this path compared to entering the wetland in a radial direction from the release area?

Additional samples need to be added to this plan including sediment samples throughout the pond and surface water samples toward the northern section of the pond. These samples can be proposed in a phased approach as well with an emphasis on the northern sections of the pond.

### **Specific Comments**

Page 1, 3<sup>rd</sup> paragraph, 2<sup>nd</sup> and 3<sup>rd</sup> sentences – These sentences mention “contaminated soil” but do not indicate how this designation was determined. Was the soil discolored, did it have a sheen, was sampling performed, etc? Please provide additional information indicating why the soil was considered contaminated.

### **NJDEP Comments**

1. (p. 1) 1. Problem Definition – Please provide a summary of the physical/habitat characteristics of the SEL Wetland Pond Area, such as size/areal extent, hydrogeology (pond bottom elevation range, water depth), fish/wildlife presence/use, etc. Is there an outlet from the pond? Please provide a figure showing its location relative to AOC 24 Woodbridge Pond and other labelled site AOCs above Riverside Dr. This section states that “heavy sheen” was recovered by Weston – does any sheen remain? Has the leak in the sewer been repaired/discharge stopped?
2. (p. 2) 3. Sample Design, Rationale, Locations – three (3) phases of sampling are proposed and limited to the stormwater sewer release pathway and perimeter wetland soils surrounding Southeast Leg (SEL) Wetland Pond at the approximate waterline. It is unclear how this approach will meet the objective to determine the “contaminants which have impacted the clean fill used to construct the SEL Wetland Pond in 2015.” In addition to proposed locations, Phase 1 sampling should include biased pond sediment and co-located surface

water samples at the release pathway influent location (at north end of pond), covering an appropriate portion of the pond (e.g., the northern half). The design of subsequent sampling phases (e.g., gridding) should depend on Phase 1 data. In accordance with NJDEP's *Ecological Evaluation Technical Guidance*, August 2018, a minimum of 2 sample depths at each soil/sediment location should be collected (0-0.5' and at least one other subsurface interval). TOC analyses are recommended at each sediment location, and total and dissolved metals should be analyzed at each surface water location.

3. (p.2) Sections 3.1 and 3.2 state that the NJDEP Residential and Non-Residential Direct Contact Soil Cleanup Criteria will be used for data comparison and contaminant delineation. As a reconstructed wetland and apparent open water area, the SEL Wetland Pond Area is an environmentally sensitive natural resource (ESNR) and comparison of data with ecological sediment/soil screening criteria is paramount. Please refer to <https://www.nj.gov/dep/srp/guidance/ecoscreening/>. Similar to the data evaluation approach used for Woodbridge Pond, the EPA-directed sediment delineation/remediation criteria for total PCBs of 1 mg/kg and for BEHP of 22 mg/kg (Washington State freshwater sediment standard) should be used for the SEL Wetland Pond sediments.

4. (p. 3) 4. Key Project Personnel and Contact Information – Please add the LSRP of record to this this list.

---

**From:** Schindler, Jason <[Jason.Schindler@WestonSolutions.com](mailto:Jason.Schindler@WestonSolutions.com)>

**Sent:** Thursday, January 30, 2020 3:41 PM

**To:** Ferreira, Steve <[Ferreira.Steve@epa.gov](mailto:Ferreira.Steve@epa.gov)>

**Cc:** Mark D. Fisher ([mfisher@elminc.com](mailto:mfisher@elminc.com)) <[mfisher@elminc.com](mailto:mfisher@elminc.com)>; Ansari, Ramin <[Ramin.Ansari@lanxess.com](mailto:Ramin.Ansari@lanxess.com)>; Venkat Puranapanda ([Venkat.puranapanda@chubb.com](mailto:Venkat.puranapanda@chubb.com)) <[Venkat.puranapanda@chubb.com](mailto:Venkat.puranapanda@chubb.com)>; Devorak, Coleen <[coleen.devorak@westonsolutions.com](mailto:coleen.devorak@westonsolutions.com)>; Sontag, John <[John.Sontag@WestonSolutions.com](mailto:John.Sontag@WestonSolutions.com)>; Peachey, Bryan <[Bryan.Peachey@WestonSolutions.com](mailto:Bryan.Peachey@WestonSolutions.com)>

**Subject:** Hatco pond sampling plan

Hi Steve,

Attached please find Weston's sampling plan for the Southeast Leg wetland pond area at the Hatco site. Please let me know how much time you anticipate for your review.

Thanks,

Jason

Jason Schindler

Principal Project Manager

Weston Solutions, Inc.

205 Campus Drive

Edison, NJ 08837

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